

HEATHER S. WHITE (7674)  
R. SCOTT YOUNG (10695)  
NATHAN A. CRANE (10165)  
SNOW, CHRISTENSEN & MARTINEAU  
Attorneys for Defendants West Valley City  
and Thayle Nielsen  
10 Exchange Place, Eleventh Floor  
Post Office Box 45000  
Salt Lake City, Utah 84145  
Telephone: (801) 521-9000  
Fax No.: (801) 363-0400

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IN THE UNITED STATES DISTRICT COURT

STATE OF UTAH, CENTRAL DIVISION

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MELISSA KENNEDY; FREDERICK  
WILLARD; and THE ESTATE OF  
DANIELLE MISHA WILLARD,

Plaintiff,

vs.

WEST VALLEY CITY; SHAUN COWLEY;  
KEVIN SALMON; JOHN COYLE; THAYLE  
“BUZZ” NIELSEN; and DOES 1-10,

Defendants.

**WEST VALLEY CITY’S AND CHIEF  
NIELSEN’S SECOND SET OF  
INTERROGATORIES TO PLAINTIFFS**

Civil No. 2:13-cv-00434

Judge David Nuffer

Magistrate Judge Evelyn J. Furse

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Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendants West Valley City and Thayle Nielsen submit the following interrogatories to Plaintiffs to be answered, under oath, within thirty (30) days after service hereof. These interrogatories are intended to be continuing so as to require a supplementation of response to the full extent required by Rule 26(e) of the Federal Rules of Civil Procedure.

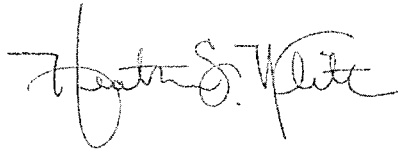
**INTERROGATORY NO. 23:** Please provide the name, address and telephone number of each witness Plaintiffs expect to call at trial, including for impeachment, and identify the subject matter about which the witness is expected to testify.

**INTERROGATORY NO. 24:** Please provide the name, address and telephone number of each witness Plaintiffs may call at trial, including for impeachment, and identify the subject matter about which the witness may testify.

These interrogatories are continuing and Plaintiff is under a duty to supplement them as required by Rule 26(e) of the Federal Rules of Civil Procedure.

DATED this 1<sup>st</sup> day of July, 2014.

SNOW, CHRISTENSEN & MARTINEAU

A handwritten signature in black ink, appearing to read "Heather S. White". The signature is fluid and cursive, with the first name "Heather" being the most prominent part.

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Heather S. White  
R. Scott Young  
Nathan A. Crane  
Attorneys for Defendants West Valley City  
and Thayle Nielsen

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of July, 2014, I caused a true and correct copy of the foregoing **WEST VALLEY CITY'S AND CHIEF NEILSEN'S SECOND ST OF INTERROGATORIES TO PLAINTIFFS** to be served, *via U.S. Mail, postage prepaid and electronic mail*, on the following:

Jon D. Williams  
9 Exchange Pl #600  
Salt Lake City, UT 84111

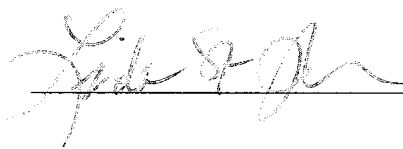
Mark J. Geragos  
Ben Meiselas  
GERAGOS & GERAGOS, APC  
644 South Figueroa Street  
Los Angeles, California 90017

*Attorneys for Plaintiffs*

Dennis C. Ferguson  
257 East 200 South, Suite 500  
P.O. Box 45678  
Salt Lake City, Utah 84145-5678  
*Attorney for Shaun Cowley*

Stephen F. Noel  
SMITH KNOWLES  
2225 Washington Blvd., Suite 200  
Ogden, UT 84401  
*Attorney for Kevin Salmon*

R. Blake Hamilton  
STIRBA, P.C.  
215 S. State Street, Suite 750  
P.O. Box 810  
Salt Lake City, Utah 84111-0810  
*Attorney for Defendant John Coyle*



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